

PATENT APPLICATION  
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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|--------------|---|--|---|-------------------------|
| Applicants   | : | Hajo RIECK et al.  | ) |                         |
| Appln. No.   | : | 10/541,846   | ) | Group Art Unit 3725     |
| Docket No.   | : | P28202   | ) | Examiner Debra M. WOLFE |
| Customer No. | : | 07055  | ) | Confirmation No. 6757   |
| Filed        | : | May 15, 2006   | ) |                         |
| Title        | : | METHOD OF FIXING THE POSITION<br>OF A PULL-TAB WITH A STEEP ANTI-<br>ROTATION DEVICE FORMED FROM<br>THE PANEL OF A SHEET METAL COVER | ) |                         |

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

U.S. Patent and Trademark Office  
Customer Service Window, Mail Stop *Issue Fee*  
Randolph Building  
401 Dulany Street  
Alexandria, VA 22314

Sir:

This is in response to the Statement of Reasons for Allowance, set forth in an attachment to the Notice of Allowability (form PTOL-37), mailed December 26, 2007.

Although Applicants do not here express disagreement with the Examiner in her indication of reasons for allowance, Applicants note that the allowed claims recite a plurality of features and the patentability of the allowed claims should be considered to be based upon the totality of the features recited therein, *i.e.*, the invention should be "considered as a whole," as defining over the prior art. *See, e.g., Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1 USPQ2d 1593 (Fed. Cir. 1987).

For example, Applicants submit that the reasons for allowance do not preclude the existence of additional reasons that could be cited as supporting the patentability of the allowed claims, *i.e.*, independent claims as well as dependent claims.

Respectfully submitted,  
Hajo RIECK et al.

  
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